

ESTTA Tracking number: **ESTTA93588**

Filing date: **08/08/2006**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91172060
Party	Plaintiff Athletics Investment Group LLC d/b/a The Oakland Athletics Baseball Company Athletics Investment Group LLC d/b/a The Oakland Athletics Baseball Company 7000 Coliseum Way, Second Floor Oakland, CA 94621 UNITED STATES
Correspondence Address	Antonio Borrelli Cowan, Liebowitz & Latman P.C. 1133 Avenue of the Americas New York, NY 10036 UNITED STATES axb@cll.com, trademark@cll.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Antonio Borrelli
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Signature	/Antonio Borrelli/
Date	08/08/2006
Attachments	a.PDF (3 pages)(20892 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

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ATHLETICS INVESTMENT GROUP, LLC d/b/a THE	:	
OAKLAND ATHLETICS BASEBALL COMPANY,	:	
Opposer,	:	Opposition No. 91 172,060
v.	:	
PALACE BASEBALL, LLC (by assignment from	:	
ASHEVILLE TOURISTS BASEBALL, INC.),	:	
Applicant.		

**MOTION ON CONSENT TO SUSPEND PROCEEDINGS
AND TO EXTEND DISCOVERY PERIOD IF OPPOSITION IS RESUMED**

Opposer, by and through counsel, hereby moves for an order suspending the proceedings in this matter for a period of six (6) months, until **February 8, 2007**. Applicant's counsel consented to this motion, which is requested to allow the parties to pursue settlement discussions.

In the event that the Board denies this motion, Opposer consents to an extension of time for Applicant to file an answer or otherwise respond to the Notice of Opposition until sixty (60) days after such denial.

If the Board grants this motion, in the event that the matter is taken out of suspense, Opposer consents to an extension of time for Applicant to answer or otherwise respond to the Notice of Opposition until sixty (60) days after the proceedings resume. Additionally, the parties request that six months of discovery be allowed and that the discovery cut off be reset to six (6)

months after the proceedings resume so that the parties will have the full period of discovery in the event that the matter is not able to be resolved. The trial periods should be reset accordingly.

Dated: New York, New York
August 8, 2006

COWAN, LIEBOWITZ & LATMAN, P.C.

By /Antonio Borrelli/
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Attorneys for Opposer

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing MOTION ON CONSENT was sent via first class, postage paid mail to Applicant's attorney, D. Scott Poley, Esq., Professional Baseball Promotion Corporate, 201 Bayshore Drive SE, Saint Petersburg, FL 33701-3903, on August 8, 2006.

/Antonio Borrelli/
Antonio Borrelli